

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

UNITED STATES OF AMERICA)
)
v.) NO. 20-CR-40037-TSH
)
VINCENT EOVACIOUS)

MOTION TO MODIFY CONDITIONS OF PRE-TRIAL RELEASE

Defendant, Vincent Eovacious, by his attorney, seeks to amend or remove additional condition of release 8(t)(ii), which orders that he is to remain on home detention and 8(j), which orders that he is to maintain his residence in Worcester, MA.

In support of this request, the Defendant states that over the summer his family home was damaged in a significant fire. He and his parents have been displaced by that fire and were living first at a hotel, and presently at a long-term, but temporary, apartment. In the past week Mr. Eovacious' family was again required to move, this time to a location outside of Worcester. Mr. Eovacious has notified the Probation Department of his new address, this has been confirmed through his father the 3rd Party Custodian, and he will continue to be monitored via SmartLink.

Further, Mr. Eovacious' father has begun repairs on their home in Worcester. We ask the Court for permission for Mr. Eovacious to work with his father at the home on weekends. Defense Counsel has conferred with the Government who assents to this request so long as Mr. Eovacious is accompanied by his father on those trips.

Respectfully submitted,

VINCENT EOVACIOUS
By his Attorney
Respectfully submitted,

/s/ Jessica Thrall
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CERTIFICATE OF SERVICE

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) on March 1, 2021.

/s/ Jessica Thrall
Jessica Thrall